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BY:

ADVANCED PAIN MANAGEMENT

4131 W. Loomis Road · Suite 300 · Greenfield, WI 53221 · Phone: 888-901-7246 · Fax: 414-325-3770 · www.apmhealth.com

Via Overnight Delivery

April 3, 2020

The Wisconsin Department of Workforce Development
Dislocated Worker Unit
PO BOX 7972
Madison, Wisconsin 53707

Re: Notice of Mass Layoff

Dear Members of the Dislocated Worker Unit:

Due to unforeseen business circumstances caused by the COVID-19 pandemic, Advanced Pain Management ("APM") regrets to inform you that it may have to permanently lay off 50 employees (excluding new and low hour employees) at its Greenfield, Wisconsin facilities located at (1) 4131 West Loomis Road, Suites 240, 250 and 300, Greenfield, Wisconsin 53221 and (2) 4448 West Loomis Road, Suite 202, Greenfield, Wisconsin 53220 (collectively, the "Greenfield Facilities"). In the past weeks, the Centers for Disease Control and Prevention, the American Academy of Surgeons, and the Surgeon General, among others, have advocated for the delay of elective medical procedures until after the current COVID-19 emergency. All of the medical procedures performed at APM are categorized as elective. In accordance with the aforementioned guidance, between March 17 through March 20, 2020, APM closed each of its Ambulatory Medical Centers and related outpatient clinics, in addition to each of its outreach clinics, through at least April 6, 2020. On March 28, 2020, however, President Trump extended the social distancing guidelines until at least April 30, 2020, and, accordingly, APM's Ambulatory Medical Centers and related outpatient and outreach clinics will remain closed until at least that date.

The majority of APM's employees are now on furlough, with the goal that they will return to work on Monday, May 4, 2020. The closure of its clinics, however, has caused a direct and immediate reduction of APM's cash flow to a point where it is unable to continue operating in its current structure on a going forward basis. If APM does not both secure sufficient financing and satisfactorily address any pending regulatory matters by April 30, 2020, that will enable it to continue operating its business in its current structure, multiple of its Ambulatory Medical Centers and related outpatient and outreach clinics will permanently close. Consequently, if these facilities permanently close, APM will be forced to permanently lay off certain employees at the Greenfield Facilities who support APM's business. Accordingly, APM is providing this Notice pursuant to Wisconsin Statutes Chapter 109.7(6)(d), which excuses the Wisconsin's Business Closing and Mass Layoff Law's 60-day notice requirement in cases of "[b]usiness circumstances that were not foreseeable when the notice would have been timely given." This action will affect only parts of the Greenfield Facilities, but, if



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it occurs, it will be permanent. If needed, APM hopes to accomplish these layoffs with the least possible disruption to the lives of our employees, their families and the community.

If APM does not both secure the aforementioned sufficient financing and satisfactorily address any pending regulatory matters by April 30, 2020, that will enable it to continue operating its business in its current structure, APM expects the layoffs at the Greenfield Facilities to take place between May 1, 2020 and May 14, 2020. Each affected employee's position is expected to be eliminated between May 1, 2020 and May 14, 2020. The employees whose jobs will be eliminated by this action will have no bumping rights that would allow them to move to another facility or remain employed after May 1, 2020.

The list attached as Exhibit A contains job titles of positions that will be eliminated from the Greenfield Facilities and the number of affected employees in each job position, should the aforementioned layoff occur. No unions represent employees at the Greenfield Facilities. Should you have any questions or need additional information, please contact Bob Bunker at (414) 325-3737.

Regards,

Bob Bunker
President and Chief Executive Officer
APM Wisconsin MSO, LLC

Dr. Dermot More-O'Ferrall
President, APM, S.C.



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Exhibit A

Job Title	Number of Positions Affected
Accountant	1
Accounts Payable Clerk	2
Assistant-Corporate	1
Business Dev. Mgr.	1
Chief Health Service Administrator	1
Clinical Assistant – WHC	2
Director of Strategic Partnership	1
Education & Training Coordinator	1
Executive Administrative Assistant	1
HR Generalist	1
IT Support	2
IT Trainer/Quality Analyst	1
IT Trainer	1
Manager	1
Medical Assistant-Corp. Clinic	3
Medical Assistant – WHC	5
Medical Records Clerk	6
PCC-Corp. Clinic	2
PCC-WHC	1
Pharmacist	1
Pre-Authorization Specialist	5
Quality & Perf. Improve. Nurse	1
Reception –Corporate	2
Research Coordinator – APM	1
Scheduler	3
Supervisor	1
Systems Administrator	1
Workers Comp. Asst.	1